

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
)
MOTORS LIQUIDATION COMPANY) Case No. 09-50026 (REG)
f/k/a GENERAL MOTORS CORPORATION,)
et al.,) Jointly Administered
)
Debtors)
_____)

**VERIFIED STATEMENT OF BRENT COON & ASSOCIATES
UNDER BANKRUPTCY RULE 2019**

I, Lori K. Slocum, a representative of Brent Coon & Associates, declare as follows:

1. I am an attorney with the law firm of Brent Coon & Associates (hereinafter the "Firm"). I am a member in good standing of the bar of the state of Texas.
2. I am involved in the Firm's representation of personal injury claimants and based upon that representation and the review of business records of the Firm, I have personal knowledge of the facts set forth herein. I make this statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the "Statement").
3. The Firm is organized under the laws of the state of Texas, with its principal offices for the practice of law located at 215 Orleans, Beaumont, TX 77701.
4. The Firm does not hold any claims against or interest in the Debtor.
5. As of the date of this Statement, the Firm represents a number of personal injury claimants (the "Claimants" or individually, a "Claimant") who have been injured by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the above-referenced debtors and debtors-in-possession (the "Debtors") and others. Attached as Exhibit "A" is a list of the Claimants represented by the Firm.

6. The address for each Claimant represented by the Firm is c/o Brent Coon & Associates, P.C., 215 Orleans, Beaumont, TX 77701.

7. The nature of the claim held by each Claimant is a personal injury tort claim for damages caused by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the Debtors and others.

8. Each Claimant acquired his or her claim more than a year prior to the filing of the above-captioned, jointly-administered bankruptcy cases.

9. The claims held by all Claimants are unliquidated.

10. Each Claimant on Exhibit A attached hereto has retained the Firm, and each Claimant has provided Brent Coon & Associates or co-counsel a limited power of attorney and proxy to represent them in bankruptcy matters. A blank but unredacted exemplar of the limited power of attorney and proxy authorizing representation of creditors is attached hereto as Exhibit B. If more than one such standard form of instrument is used by Brent Coon & Associates or co-counsel, one exemplar of each such agreement or instrument is included in Exhibit B, and labeled B-1, B-2, etc.

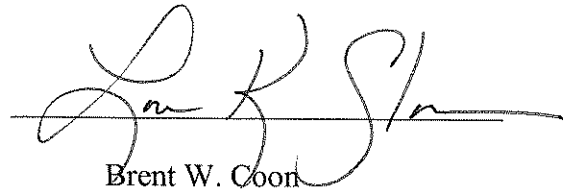
11. The Firm will file an amended and supplemental statement setting forth any material changes in the facts contained in this Statement, should any such changes occur.

12. The filing of the Firm's Statement does not waive any rights including (i) the Claimants' rights to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) the Claimants' rights to trial by jury in any proceeding and any trial on their claims; (iii) the Claimants' rights to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal or abstention to the extent not previously directed; (iv) the Claimants' rights in not submitting themselves to the jurisdiction of

the Bankruptcy Court; or (v) any other rights, claims, actions, defenses, reclamations, setoffs, or recoupments to which the Claimants are or may be entitled under any agreements, in law or in equity, all of which rights, claims, actions, defenses, reclamations, setoffs, and recoupments the Firm's Claimants expressly reserve.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of November, 2009, at Beaumont, Texas.

A handwritten signature in black ink, appearing to read "Brent W. Coon", is written over a horizontal line.


Brent W. Coon
Texas State Bar No. 04769750
Lori K. Slocum
Texas State Bar No. 24048597
Brent Coon & Associates
215 Orleans Street
Beaumont, TX 77001
(409) 835-2666
(409) 833-4483 (facsimile)

State of Texas :

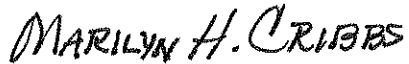
County of Jefferson :

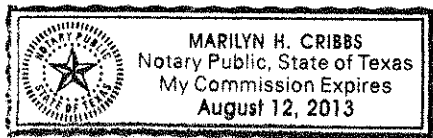
On this the 23rd day of November, 2009, before me the undersigned officer, personally appeared Lori Slocum, known to me to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.


Notary Public

(SEAL)


Notary's name printed



Commission expires: 08-12-2013